

1 DAVID CHIU, State Bar # 189542
2 City Attorney
3 YVONNE R. MERÉ, State Bar #173594
4 Chief Deputy City Attorney
5 WAYNE SNODGRASS, State Bar #148137
6 TARA M. STEELEY, State Bar # 231775
7 JOHN H. GEORGE, State Bar # 292332
8 KAITLYN M. MURPHY, State Bar #293309
9 Deputy City Attorneys
10 City Hall, Room 234
11 1 Dr. Carlton B. Goodlett Place
12 San Francisco, California 94102-4682
13 Telephone: (415) 554-4675 [Snodgrass]
14 (415) 554-4655 [Steeley]
15 (415) 554-4223 [George]
16 (415) 554-6762 [Murphy]
17 Facsimile: (415) 554-4699
18 E-Mail: wayne.snodgrass@sfcityatty.org
19 tara.Steeley@sfcityatty.org
20 john.george@sfcityatty.org
21 kaitlyn.murphy@sfcityatty.org

22 Attorneys for Defendant
23 CITY AND COUNTY OF SAN FRANCISCO

24 UNITED STATES DISTRICT COURT
25 NORTHERN DISTRICT OF CALIFORNIA

26 HASTINGS COLLEGE OF THE LAW, a
27 public trust and institution of higher education
28 duly organized under the laws and the
Constitution of the State of California;
FALLON VICTORIA, an individual; RENE
DENIS, an individual; TENDERLOIN
MERCHANTS AND PROPERTY
ASSOCIATION, a business association;
RANDY HUGHES, an individual; and
KRISTEN VILLALOBOS, an individual,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN
FRANCISCO, a municipal entity,

Defendant.

Case No. 4:20-cv-3033-JST

**DECLARATION OF KRISTA GAETA IN
SUPPORT OF DEFENDANT CITY AND
COUNTY OF SAN FRANCISCO'S
OPPOSITION TO PLAINTIFFS' MOTION TO
ENFORCE STIPULATED INJUNCTION**

Hearing Date: May 23, 2024
Time: 2:00 p.m.
Place: Hon. Jon S. Tigar
Oakland Courthouse
Courtroom 6 – 2nd Floor
1301 Clay Street
Oakland, CA 94612

Trial Date: Not Set

1 I, KRISTA GAETA, declare:

2 1. I have personal knowledge of the matters stated herein, and if called and sworn as a
3 witness could and would competently testify thereto.

4 2. I have worked on issues related to public health, homelessness, and/or supportive
5 housing for nearly twenty years, including in organizations specifically focused on the Tenderloin
6 neighborhood in San Francisco.

7 3. I currently work for the San Francisco Department of Public Health where I am the
8 Director of Strategic Initiatives within the Population Behavioral Health Services division. I have a
9 Masters in Social Work and have been employed by the City and County of San Francisco since
10 February 2018.

11 4. As a result of my personal experience working to address public health and housing
12 issues in San Francisco, I am familiar with the programs the Department of Public Health offers that
13 intersect with persons experiencing homelessness in San Francisco including the Night Navigator
14 Program.

15 5. The Night Navigator Program launched in October 2023 with the goal of providing
16 trauma-informed care and referral services during the nights and weekends. The program operates
17 between 7 pm and 3 am.

18 6. The Night Navigator Program operates primarily in the Tenderloin neighborhood and
19 provides persons experiencing homelessness access to resources, referrals, de-escalation support, and
20 other on-the-spot as well as medium-term case management services.

21 7. In its first six months of operation the Night Navigators Program has already engaged
22 4,161 clients and has made more than two thousand referrals for further services. This includes 515
23 medical referrals, 186 mental health referrals, 481 substance use disorder referrals, 200 drop-in
24 referrals, and 886 shelter or housing referrals. A referral indicates when the Night Navigator staff
25 assisted a client in identifying a specific resource for their stated need.

26 8. The program has also connected more than 400 individuals with services. This includes
27 6 medical connections, 96 substance use disorder connections, 16 drop-in connections, and 377 shelter

1 or housing connections. A connection occurs when the Night Navigator Program staff can confirm a
2 connection to a referred service through phone calls or walking or driving a client directly to the
3 service.

4 9. The Night Navigator Program has also distributed 2,578 units of Narcan designed to
5 reduce the harm associated with drug overdose and has distributed hygiene and outreach supplies to
6 218 clients.

7 10. Based on my experience at DPH and familiarity with the efforts it has taken to reduce
8 homelessness in the Tenderloin and throughout San Francisco, I believe DPH makes every effort given
9 the circumstances to achieve the goal of ensuring that every person who wants to accept shelter or
10 other City-provided services is able to do so.

11
12 I declare under penalty of perjury under the laws of the United States and the State of
13 California that the foregoing is true and correct. Executed March 27, 2024 in San Francisco,
14 California.

15 *Krista Gaeta*
16

17 KRISTA GAETA
18
19
20
21
22
23
24
25
26
27
28